

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PIYUSH PALEJA,

Plaintiff,

-against-

KP NY OPERATIONS LLC a/k/a KAILASH  
PARBAT,

Defendant.

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**Case No.:** 1:20-cv-475 (AT) (KNF)

**DECLARATION OF EMANUEL  
KATAEV, ESQ. IN SUPPORT OF  
DEFENDANT'S OBJECTIONS TO  
MAGISTRATE JUDGE KEVIN  
NATHANIEL FOX'S ORDER  
COMPELLING DISCOVERY**

**EMANUEL KATAEV, ESQ.**, declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

1. I am admitted to practice before this Court and I am an associate of Milman Labuda Law Group PLLC, attorneys for the Defendant in this case.

2. I respectfully submit this Declaration in support of Defendant's objections to Magistrate Judge Kevin Nathaniel Fox's September 28, 2020 Order compelling discovery ("Motion"), and to supply this Court with exhibits relevant to its determination of the Motion.

3. Attached hereto as Exhibit A is a true and correct copy of the parties' September 24, 2020 joint letter concerning Plaintiff's letter motion to compel the deposition of Anika Malhotra and to compel Defendant's responses to Plaintiff's interrogatories.

4. Attached hereto as Exhibit B is a true and correct copy of September 28, 2020 Order by the Hon. Kevin Nathaniel Fox, U.S.M.J. granting Plaintiff's requested relief.

5. I declare under penalty of perjury that the foregoing is true and correct. Executed on October 5, 2020.

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/s/  
**EMANUEL KATAEV**